

# EXHIBIT “A”

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

-----X  
KEVIN LAWRENCE,

Plaintiff,

-against-

HI VOLT ELECTRIC, LLC and MATTHEW EALEM,

Defendant.  
-----X

To the above named Defendant(s)

Index No.  
Date Filed:

Plaintiff designates  
County of Queens  
as the place of trial

The basis of the venue  
is plaintiff's  
residence

**SUMMONS**

Plaintiff resides at  
118-51 220<sup>th</sup> Street  
Cambria Heights, NY 11411

County of Queens

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's Attorney(s) within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Mineola, New York  
July 23, 2021

  
VICTOR A. CARR & ASSOCIATES  
Attorneys for Plaintiff  
88 Second Street  
Mineola, NY 11501  
516-747-2478

Defendant's address:

Hi Volt Electric, LLC  
5 Farragut Lane  
Old Bridge, NJ 08857

Mr. Matthew Ealem  
5 Farragut Lane  
Old Bridge, NJ 08857

**DELIVER THESE PAPERS TO YOUR INSURANCE COMPANY IMMEDIATELY OR  
CONSULT AN ATTORNEY TO AVOID A JUDGMENT**

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

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KEVIN LAWRENCE,

Plaintiff,

- against -

HI VOLT ELECTRIC, LLC and MATTHEW EALEM,

Defendants.

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**VERIFIED COMPLAINT**

**Index #**

**Filed:**

*Plaintiff, complaining of the defendants, by plaintiffs' attorneys,*  
**VICTOR A. CARR & ASSOCIATES**, *respectfully sets forth and alleges as follows:*

1. That at all times hereinafter mentioned, plaintiff resided in the County of Queens, State of New York.
2. Upon information and belief and at all times hereinafter mentioned, defendant, HI VOLT ELECTRIC, LLC, was and is a domestic limited liability company duly organized and existing under and by virtue of the laws of the State of New Jersey.
3. Upon information and belief and at all times hereinafter mentioned, defendant, HI VOLT ELECTRIC, LLC, was and is a foreign limited liability company duly authorized to do business in the State of New York.

4. Upon information and belief and at all times hereinafter mentioned, defendant, HI VOLT ELECTRIC, LLC, was and is a foreign limited liability company not authorized to do business in the State of New York.

5. Upon information and belief and at all times hereinafter mentioned, defendant, HI VOLT ELECTRIC, LLC, was the owner of a 2013 Ford SW/SUV truck, bearing New Jersey State registration XBDE18 for the year 2020.

6. Upon information and belief and at all times hereinafter mentioned, defendant, MATTHEW EALEM, was the operator of a 2013 Ford SW/SUV truck, bearing New Jersey State registration XBDE18, with the knowledge, permission and consent of its owner.

7. That on January 8, 2020, at approximately 8:20 a.m., defendant, MATTHEW EALEM, was operating the aforesaid 2013 Ford SW/SV truck in the vicinity of 119<sup>th</sup> Avenue at its intersection with 220<sup>th</sup> Street in Queens, New York.

8. Upon information and belief and at all times hereinafter mentioned, plaintiff, KEVIN LAWRENCE, was the owner of a 2016 Honda SW/SUV, bearing New York State registration HCC3849.

9. Upon information and belief and at all times hereinafter mentioned, plaintiff, KEVIN LAWRENCE, was the operator of a 2016 Honda SW/SUV, bearing New York State registration HCC3849, with the knowledge, permission and consent of its owner.

10. That on January 8, 2020, at approximately 8:20 a.m., plaintiff, KEVIN LAWRENCE, was operating the aforesaid Honda in the vicinity of 119<sup>th</sup> Avenue at its intersection with 220<sup>th</sup> Street in Queens, New York.

11. That on the aforesaid date, time and place, there was a contact between the two (2) aforesaid motor vehicles.

12. That the aforesaid occurrence and the injuries and damages to the plaintiff, KEVIN LAWRENCE, resulting therefrom were caused by the negligence of the defendant, without any negligence on the part of the plaintiff contributing thereto.

13. That the negligence of the defendants, consisted of owning, operating, maintaining and controlling the motor vehicle in a careless, reckless and dangerous manner; in failing to properly maintain, equip and repair the vehicle(s); in failing to provide good and sufficient steering and braking systems; in failing to timely utilize adequate, sufficient braking and/or other safety devices; in failing to keep a proper lookout ahead; in failing to give warning or signal of approach; in violating the "Rules of the Road" and the Vehicle and Traffic Regulations of the State of New York; in failing to take reasonable steps to avoid the accident; in operating the vehicle(s) at a high and excessive rate of speed; in failing to yield the right of way; in failing to have said motor vehicle under proper control; in failing to properly brake and steer said motor vehicle; in failing to stop or slow down prior to said accident; in failing to properly observe and heed the road and traffic conditions existing at

the time of the accident; and in general, in failing to use that degree of care and caution required by the circumstances.

14. That as a result of the foregoing, the plaintiff, KEVIN LAWRENCE, was caused to suffer severe and painful injuries, was rendered sick, sore and disabled; suffered and still suffers and will continue to suffer bodily pain and mental anguish for some time to come; has been and will be required to seek and obtain medical care and treatment; has been unable to attend to usual vocation and duties; and has been informed and does believe that some of the injuries will prove to be permanent and that plaintiff will suffer pain, discomfort and embarrassment solely by reason of the aforementioned conduct of the defendant.

15. That as a result of the foregoing, plaintiff sustained serious injuries as defined by Section 5102 of the New York State Insurance Law.

16. That by reason of the foregoing, said plaintiff demands judgment against the defendants in an amount that exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**WHEREFORE**, plaintiff demands judgment against the defendants in an amount that exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction, together with the interest, costs and disbursements of this action.

Dated: Mineola, New York  
July 23, 2021

Yours, etc.,



**VICTOR A. CARR & ASSOCIATES**  
Attorneys for Plaintiff  
88 Second Street  
Mineola, New York 11501  
(516) 747-2478

**ATTORNEY'S VERIFICATION**

VICTOR A. CARR, an attorney duly admitted to practice law in the courts of the State of New York hereby affirms the following under the penalties of perjury:

He is the attorney for the plaintiff in the within action; that he has read the foregoing VERIFIED COMPLAINT and knows the contents thereof, that the same is true to the best of his own knowledge, except as to the matters therein stated to be alleged on information and belief, and that as to those matters he believes them to be true.

The reason this verification is not made by the plaintiff is that the plaintiff resides and is located outside the County where we maintain our offices.

The source of deponent's information and the grounds for his belief, as to those matters stated upon information and belief, are statements furnished to deponent by plaintiff and records in deponent's file.

  
\_\_\_\_\_  
VICTOR A. CARR

Index No.

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

KEVIN LAWRENCE,

*Plaintiff,*

- against -

HI VOLT ELECTRIC, LLC and MATTHEW EALEM,

*Defendants.*

**SUMMONS & VERIFIED COMPLAINT**

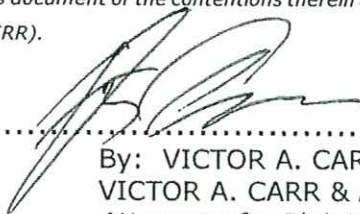
**VICTOR A. CARR & ASSOCIATES**

*Attorneys for Plaintiff*

88 Second Street  
Mineola, New York 11501  
(516) 747-2478  
FAX (516) 747-2574  
victor@victorcarrlaw.com

**Section 130-1.1 Statement**

*By signing of the within document, the above attorney certifies that, to the best of the said attorney's knowledge, information and belief, formed after an inquiry reasonable under the circumstances, the presentation of this document or the contentions therein are not frivolous as defined in subsection (c) of Section 130-1.1 of the Rules of the Chief Administrator (22NYCRR).*



By: VICTOR A. CARR  
VICTOR A. CARR & ASSOCIATES  
*Attorneys for Plaintiff*  
88 Second Street  
Mineola, New York 11501  
(516) 747-2478